

### **REMARKS**

This Amendment is filed in response to the Office Action dated August 19, 2005 and the telephonic interview held between Applicants' counsel and the Examiner on December 14, 2006. Applicants first note with appreciation the Examiner's thorough examination of the application as evidenced by the Office Action. Applicants also note with appreciation the courtesies extended by the Examiner to Applicants' counsel.

In response to the Office Action, Applicants have amended Claims 1, 3, 7, 9, 13, 15, 19, 21, 23, and 25 and added new Claims 27-47. As currently presented, the patent application now includes Claims 1-47 with Claims 1, 7, 13, 19, 23, and 25 being independent claims. Applicants respectfully submit that the amended claims are patentable over the cited references. Applicants therefore request that the Examiner reconsider the claims in light of the remarks below.

#### **I. Missing Information Disclosure Statement**

In paragraph 3, the Office Action again indicates that it did not receive the PTO-1449 form submitted with the information disclosure statement (IDS) filed July 25, 2002. Applicants reiterate that an IDS was not filed on this date. Instead, a request for publication of the application was filed by Applicants to inform the patent office that the application had been filed foreign, and thus was subject to publication rules. As such, Applicants submit that there is no missing IDS or PTO-1449 form.

#### **II. Description of the Invention**

The claimed invention relates to systems and methods of populating a master data store, where the master data store acts as a cross-reference to a plurality of electronic storage facilities. Specifically, each of the electronic storage facilities includes customer information that has an associated customer ID. Unfortunately, not all of the electronic storage facilities use the same customer ID for each customer. Therefore, one has to know the specific customer ID used for by each electronic storage facility in order to access information on a customer from various electronic storage facilities. In this regard, the master data store includes a unique identifier for each customer. Associated with each unique identifier is a list of the different electronic storage facilities that contain information about the customer and the customer ID used by each

electronic storage facility to reference the information. By using the master data store, one can determine all electronic storage facilities that contain information about a customer and the customer ID needed to access the information.

An important feature of the claimed invention is that the master data store is populated and updated “on the fly” through interaction with the plurality of electronic storage facilities. Specifically, when a new customer is added to one of the electronic storage facilities, the electronic storage facility sends the customer’s information to the master data store. The system, method, and computer of the claimed invention check the customer information against the data in the master data store. If the customer is not already indexed in the master data store, a unique identifier is assigned to the customer and a data record is inserted in the master data store that includes the unique identifier, the electronic storage facility supplying the customer information, and the identification used by the electronic storage facility to identify the customer. If the customer is already uniquely identified in the master data store, the system, method, and computer of the present invention create a new record that includes the unique identifier, the electronic storage facility supplying the customer information, and the identification used by the electronic storage facility to identify the customer. In this way, the master data store is populated and updated by the plurality of electronic storage facilities connected thereto as new customer information is received by the electronic storage facilities.

The operation of the claimed invention may be better understood by the following example. Figure 2 of the application illustrates an example master data store for the network illustrated in Figure 1. As illustrated in Figure 2, there is a customer named Sandy L. Smith in the network. See **250**. She has been assigned a unique identity number of “3” in the master data store. As illustrated at **210**, she has information stored in electronic storage facility **120** under customer ID “ACZ20.” She also has information stored in electronic storage facility **130** under customer ID “5.” If later, Sandy L. Smith is added to electronic storage facility **110** with customer ID Sandra Smith, the following steps take place:

- 1) The system, method, and computer receive identifying information on the customer Sandy L. Smith from the electronic storage facility **110**;

- 2) The system, method, and computer determine whether an identifier exists in the master data store for the customer based on the received identifying information. The electronic storage facility typically sends information such as the customer's name, phone number, social security number, email address, etc., which are used by the system, method, and computer to determine if the customer matches an existing customer profile in the master data store.;
- 3) The system, method, and computer would determine that the new customer information relates to unique ID "3" in the master data store and assign the identifier "3" to the new information.; and
- 4) The system, method, and computer next cross-reference the assigned identifier with the received identifying information. In other words, the system, method, and computer create the following new record in the master data store as shown in the hi-lighted last row:

CNDA ID	D.S. ID	Customer ID
3	120	ACZ20
71	120	CBK01
3	130	5
105	110	John Doe
159	130	10
235	110	John Doe
71	120	RYT51
3	110	Sandra Smith

### III. The Claims Are Patentable

As currently presented, the patent application includes Claims 1-26 with Claims 1, 7, 13, 19, 23, and 25 being independent claims. Independent Claims 1, 7, and 13 are directed to systems and methods of creating a master data store that cross-references customer information stored in different databases. Specifically, when the systems and methods receive customer information from a particular database, it checks to see if there is already a unique customer ID in the master data store for the customer. If so, it stores under the unique customer ID a reference to the database where the customer data just received is located and the ID used by the database for the customer. Claims 19, 23, and 25 are directed to systems and methods that have a plurality of databases all including customer data with different IDs for the same customer and

a master data store that includes a unique ID for each customer and a cross-reference to each database containing information on the customer and the ID used by each database for the customer.

The Office Action rejects all of the claims of the application as obvious in light of U.S. Patent Appl. No. 2003/0004760 to Schiff in combination with U.S. Patent No. 6,363,388 to Sprenger et al. The Office Action alleges that the '760 Schiff application discloses all aspects of the independent claims except for creating a cross-reference table containing the different identities used for a customer in different databases and a reference to each database. In this regard, the Office Action alleges that this aspect of the claims is disclosed in the '388 Sprenger patent. Applicants respectfully disagree with these rejections. Applicants respectfully submit that there is no teaching or suggestion for combining the references and even if combined, the combined references do not meet the claims.

**A. References Fail To Disclose Population of the Master Data Store**

Independent Claims 1, 7, 13, 19, 23, and 25 all recite systems and methods for populating the mass data store with information for cross-referencing customer information located in different electronic storage facilities. Applicants respectfully submit that neither the '760 Schiff application nor the '388 Sprenger patent, taken individually or in combination, teaches or suggests this aspect of the claimed invention.

With regard to the '760 Schiff application, it merely discloses that customer information is stored in a customer database. It nowhere teaches or suggests that customer information could be stored in different databases, much less a method for creating a mass data store that cross-references the information from the various databases.

With regard to the '388 Sprenger patent, the ExternalXref table disclosed therein is quite different from the mass data store of the claimed invention. The ExternalXref table merely cross-references an identification number generated by a master system and an internal identification number used by a database. The '388 Sprenger patent nowhere teaches or suggests that the ExternalXref table cross-references customer information stored in different electronic storage facilities as is recited in the claims. Further, there is no teaching or suggestion in the '388 Sprenger patent whatsoever concerning systems and methods for creating such a mass data

store. The '388 Sprenger patent merely indicates that the ExternalXref table exists. It nowhere teaches or suggests how the ExternalXref table is created.

The claims of the present invention are directed to how the mass data store is populated, which is nowhere disclosed in the '388 Sprenger patent. As such, the '388 Sprenger patent nowhere teaches or suggests the following recitations of the claims:

- receiving identifying information on the a customer from an electronic storage facility containing information about the customer including a second customer identifier that is different from the first customer identifier;
- storing the received identifying information in a second data record;
- determining that the identifying information in the first and second data records are associated with the same customer;
- assigning an identifier based on a result of the determination; and
- cross-referencing the assigned identifier with the identifying information stored in the first and second data records.

#### **B. The Cited References Are Not Combinable**

Applicants submit that in making the combination the Office Action attempted to combine a teaching from the '388 Sprenger patent that is not needed or necessary in the '760 Schiff application. The Office Action argues that the motivation for combining the references is that the discussion in the '388 Sprenger patent concerning cross-referencing of information would be helpful in cross-referencing information in a complex database. This argument misses the point. The system of the '760 Schiff application patent does not include customer information in different databases. The system of the '760 Schiff application includes all of the customer information in one database. As all of the data relating to each customer is in one database in the system of the '760 Schiff application, the system does not need and would not use the cross-referencing techniques described in the '388 Sprenger patent. More importantly, one skilled in the art looking to solve a problem of cross-referencing customer information stored in multiple databases would not be motivated to combine a reference that contains data about a customers only in one database (i.e., '760 Schiff application) with a reference discussing in general cross-referencing of information (i.e., '388 Sprenger patent).

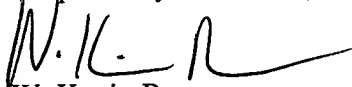
Applicants further submit that even if there was a suggestion to combine the references, that the combination would not meet the claims. Specifically, as discussed above, the system of the '760 Schiff application includes customer data only in one database. Therefore, in the combination, there would be no cross-referencing of customer information stored in different databases because the system of the '760 Schiff application only has customer data in one database.

### CONCLUSION

In light of the above, Applicants respectfully submit that Claims 1-47 of the patent application are patentable over the cited references. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

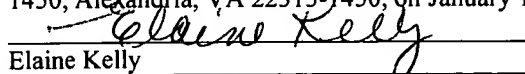


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#### CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on January 18, 2006.



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CLT01/4775671v1